

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED PROMOTIONS, INC. and)	
FERNANDO FIGUEREDO,)	
	<i>Plaintiffs,</i>)
)	
v.)	Case No. 2011-CV-6892
)	
LINDSAY CORP., ANDRES GACHARNA,)	Judge Der-Yeghiayan
and CATHERINE E. LINDSAY,)	
	<i>Defendants.</i>)

NOTICE OF MOTION

TO: SEE ATTACHED SERVICE LIST.

YOU ARE HEREBY NOTIFIED that on **October 25, 2011** at **9:00** a.m. or as soon thereafter as counsel may be heard, I shall appear before the **Honorable Samuel Der-Yeghiayan**, or any judge sitting in his stead, in **Courtroom No. 1903** of the U.S. District Court of the Northern District of Illinois, Eastern Division, 219 South Dearborn Street, Chicago, Illinois, and shall present the attached **Motion to Dismiss or in the Alternative to Quash under Fed.R.Civ.P. 12(b)(2) and 12(b)(5)**.

CERTIFICATE OF SERVICE

I hereby certify that on **October 17, 2011**, I caused the foregoing to be filed electronically with the Clerk of the Court using the CM/ECF system which sent notification of such filing to the parties to whom it is directed.

By: /s/ Andrew R. Schwartz

Andrew R. Schwartz ARDC #6198719
andy@schwartz-lawyer.com
Thomas Kanyock ARDC #6211477
tjk@schwartz-lawyer.com
SCHWARTZ & KANYOCK, LLC
Counsel for Certain Defendants
111 North Canal Street, Ste. 394
Chicago, Illinois 60606
(312) 441-1040

SERVICE LIST

Timothy Q. Delaney
Brinks Hofer Gilson & Lione
NBC Tower-Suite 3600
455 N. Cityfront Plaza Dr.
Chicago, IL 60611
tdelaney@brinkshofer.com

Andrea L. Evensen
Brinks Hofer Gilson & Lione
NBC Tower-Suite 3600
455 N. Cityfront Plaza Drive
Chicago, IL 60611
aevensen@brinkshofer.com

Jeffrey J. Toney
Kasowitz Benson Torres
& Friedman LLP
1360 Peachtree Street N.E.
Suite 1150
Atlanta, GA 30309
jtoney@kasowitz.com

Darcy L. Jones
Kasowitz Benson Torres
& Friedman LLP
1360 Peachtree Street N.E.
Suite 1150
Atlanta, GA 30309
djones@kasowitz.com